

**Before the
Federal Communications Commission
Washington, D.C. 20554**

RECEIVED

FEB 22 2006

Federal Communications Commission
Office of Secretary

In the Matter of)	
)	
Modification of the Universal Licensing)	
System to Allow TV Pickup Stations)	RM No. 11308
And Remote Pickup Stations to Document)	
The Locations and Heights of Their)	
Receive-Only Sites)	
)	

COMMENTS OF THE WALT DISNEY COMPANY

These comments are submitted on behalf of The Walt Disney Company, which through subsidiaries owns ten television stations in the following markets: New York, Los Angeles, Chicago, Philadelphia, San Francisco, Houston, Raleigh-Durham, Fresno, Flint, and Toledo. Disney also owns The ABC Television Network (again, through subsidiaries). Disney is filing these comments to support the Petition for Rulemaking filed by the Society of Broadcast Engineers, Inc. (SBE), RM-11308.¹

The SBE petition proposes that the Universal Licensing System (ULS) and FCC Form 601 be amended to allow TV Pickup licensees to document the locations and heights of their electronic news gathering (ENG) receiving sites. The petition also requests a similar capability

¹ This petition was filed on September 6, 2005, and was placed on public notice on January 23, 2006.

No. of Copies _____ 0
List A B C D E

for Remote Pickup (RPU) licenses to be able to document the locations and heights of any RPU receive-only sites they may have.

The ABC Television Network and the ABC Owned Television stations devote substantial resources to broadcasting to the public the most accurate and information newscasts and effective and reliable ENG services are critical to achieving that goal. As described in the SBE Petition, broadcast engineers believe that users of nearby spectrum would work cooperatively to avoid interference, but they currently cannot avoid inadvertently selecting a location too close to an ENG receive-only site if they don't know the locations of those sites. Amending the ULS and Form 601 as suggested by SBE, to give TV Pickup licenses the option of entering the locations and heights of their ENG receive-only sites into the ULS, so they can be found on a searchable basis by interested parties, is a change that would make the ULS truly "universal" and would permit greater efficiency and effectiveness for all spectrum users.

Therefore, Disney/ABC supports the SBE petition, and respectfully requests the Commission to proceed to issue a Notice of Proposed Rulemaking on this subject.

Respectfully submitted,

/s/ Susan L. Fox
Vice President, Government Relations
The Walt Disney Company
1150 17th Street, NW, Suite 400
Washington, D.C. 20036
(202) 222-4700

February 22, 2006